

LAW OFFICES OF KIRK B. FREEMAN
KIRK B. FREEMAN Bar No. 99685
MATTHEW A. MALLET Bar No. 203393
214 Grant Avenue, Suite 301
San Francisco, California 94108
Telephone: (415) 398-1082
Fax: (415) 391-1285

Attorneys for Defendant MONTAG DIVULGAÇÃO LTDA.

OWEN SEITEL (SBN 137365)
ELIZABETH J. REST (SBN 244756)
IDELL & SEITEL LLP
465 California Street, Suite 300
San Francisco, CA 94104
Telephone: (415) 986-2400
Facsimile: (415) 392-9259

Attorneys for Plaintiff ROBERT SZEGEDY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ROBERT SZEGEDY, an individual;)	Case No.: C 10-05579 EMC
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER TO POSTPONE HEARING
vs.)	ON DEFENDANT MONTAG
)	DIVULGAÇÃO LTDA.'S MOTION TO
MONTAG DIVULGAÇÃO LTDA., a)	SET ASIDE ENTRY OF DEFAULT
Brazilian limited liability partnership; and)	AND PLAINTIFF ROBERT
DOES 1 through 100, inclusive,)	SZEGEDY'S APPLICATION FOR
)	ENTRY OF DEFAULT JUDGMENT
Defendants.)	BY COURT
)	
)	Courtroom: 5, 17th Floor
)	Judge: Hon. Edward M. Chen
)	
)	Action Filed: December 9, 2010
)	Trial Date: TBD
)	(E-Filing)

WHEREAS Defendant has filed with this Court a Motion to Set Aside Default, and Plaintiff has filed an Application for Entry of Default Judgment by Court, both of which, by stipulation and Court order, currently are scheduled to be heard on September 16, 2011 at 1:30 p.m.; and

WHEREAS Defendant's counsel, Kirk B. Freeman, Esq., was to be in trial in Orange County Superior Court in Case No. 30-2011-00457273, entitled *Convenience Retailers LLC v. K & R Services, Inc.*, for an estimated two weeks beginning August 8, 2011, but which trial has been continued, over Mr. Freeman's objection, to September 12, 2011; and

WHEREAS Plaintiff's and Defendant's counsel are both available on September 30, 2011:

THE PARTIES TO THIS ACTION STIPULATE, through their undersigned counsel, that:

(1) the hearing on Defendant's Motion to Set Aside Default and the hearing on Plaintiff's Application for Entry of Default Judgment by Court will be September 30, 2011, at 1:30 p.m., or on a date and at a time thereafter convenient to this Court.

THE PARTIES HEREBY STIPULATE TO THE ABOVE:

IDELL & SEITEL LLP

Dated: August 15, 2011

/s/ Owen Seitel
Owen Seitel
Attorneys for Plaintiff
ROBERT SZEGEDY

LAW OFFICES OF KIRK B. FREEMAN

Dated: August 15, 2011

/s/ Kirk B. Freeman
Kirk B. Freeman
Attorneys for Defendant
MONTAG DIVULGAÇÃO LTDA.

SIGNATURE ATTESTATION

I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/s/) within this efiled document.

LAW OFFICES OF KIRK B. FREEMAN

Dated: August 15, 2011

/s/ Kirk B. Freeman

Kirk B. Freeman

Attorneys for Defendant

MONTAG DIVULGAÇÃO LTDA.

IT IS HEREBY ORDERED:

(1) The hearing on Defendant's Motion to Set Aside Default and the hearing on Plaintiff's Application for Entry of Default Judgment by Court will be September 30, 2011 at 1:30 p.m.

Dated: August ¹⁶__, 2011

